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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS
IN SUPPORT OF REORGANIZED
DEBTORS' NINETY-SECOND OMNIBUS
OBJECTION TO CLAIMS (SATISFIED
CLAIMS)**

**Response Deadline:
July 14, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: July 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Robb C. McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a Managing Director at the firm of AlixPartners, LLP ("**AlixPartners**"), which is
5 an affiliate of both AlixPartners, LLC and AP Services, LLC ("**APS**"). APS was previously retained to
6 provide interim management services to PG&E Corporation and Pacific Gas and Electric Company, as
7 debtors and reorganized debtors (collectively, the "**Debtors**," or, as reorganized pursuant to the Plan, the
8 "**Reorganized Debtors**") in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**"). I submit
9 this Declaration in support of the *Reorganized Debtors' Ninety-Second Omnibus Objection to Claims*
10 (*Satisfied Claims*) (the "**Omnibus Objection**"),¹ filed contemporaneously herewith.

11 2. In my current position, I am responsible for overseeing the Bankruptcy Case Management
12 component of AlixPartners' assignment to assist the Reorganized Debtors with various matters related
13 to these Chapter 11 Cases. My area of responsibility includes the effort by AlixPartners, in coordination
14 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,
15 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing limited support with
16 respect to Securities Claims. I am generally familiar with the Reorganized Debtors' day-to-day
17 operations, financing arrangements, business affairs, and books and records. Except as otherwise
18 indicated herein, all facts set forth in this Declaration are based upon my personal knowledge, the
19 knowledge of other AlixPartners professionals working under and alongside me on this matter, my
20 discussions with the Reorganized Debtors' personnel, the Reorganized Debtors' various other advisors
21 and counsel, and my review of relevant documents and information prepared by the Reorganized
22 Debtors. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I
23 am authorized to submit this declaration on behalf of the Reorganized Debtors.

24 3. The AlixPartners team under my supervision has been actively and intimately involved
25 in the claims review and reconciliation process since shortly after the filing of these Chapter 11 Cases.
26 AlixPartners initially assisted the Debtors in the preparation of their bankruptcy schedules based on the

27 _____
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection.

1 Debtors' books and records. As claims were filed, AlixPartners coordinated with the Debtors the process
2 of reconciling filed claims with the Debtors' schedules and books and records to determine the validity
3 of filed claims based on those schedules and books and records. AlixPartners has developed and
4 maintains a claims reconciliation database and various data management applications that are used by
5 the Reorganized Debtors and AlixPartners to identify both valid claims as well as claims that are not
6 valid in whole or in part and the appropriate grounds for objection to such claims. AlixPartners is now
7 supporting, and will continue to support, the efforts of the Reorganized Debtors and their counsel to
8 resolve disputed claims, including by formal objections as necessary.

9 4. As part of the claims review and reconciliation process described above, the AlixPartners
10 team, working with the Reorganized Debtors' personnel and other professionals, has identified a number
11 of filed and scheduled claims that have been fully paid—and thus completely satisfied and released—
12 prior to the commencement of or over the course of these Chapter 11 Cases. The Omnibus Objection is
13 directed to some of those claims—those specifically identified in **Exhibit 1** to the Omnibus Objection,
14 in the column headed "Claim/Schedule To Be Disallowed and Expunged," and referred to in the
15 Omnibus Objection as "Satisfied Claims." **Exhibit 1** to the Omnibus Objection was prepared by the
16 AlixPartners team under my overall supervision, and I am familiar with both documents, their contents,
17 and the process under which they were prepared.

18 5. **Exhibit 1** to the Omnibus Objection also identifies in the "Basis for Objection" that the
19 Satisfied Claims are classified as "Satisfied Claims." The Satisfied Claims are so classified because they
20 have been satisfied prior to or during the pendency of these Chapter 11 Cases, in some cases by payments
21 pursuant to an order granting one of the Debtors' first-day motions.

22 6. Based on AlixPartners' review of the Reorganized Debtors' books and records and my
23 team's consultations with the Reorganized Debtors' personnel, each of the Satisfied Claims identified
24 on **Exhibit 1** to the Omnibus Objection has been satisfied prior to or over the course of the Chapter 11
25 Cases.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief. Executed this seventeenth day of June,
3 2021.

4 /s/ Robb McWilliams
5 Robb McWilliams
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